

PENINSUAL HEALTH – MODERN SLAVERY STATEMENT

Introduction

This Modern Slavery Statement is made pursuant to the Commonwealth Modern Slavery Act 2018 (the Act) by Peninsula Health and relates to the financial year 1 July 2021 to 30 June 2022.

Reporting Criterion 1: identify the reporting entity

Peninsula Health is the major public health service established under section 181 of the Health Services Act 1988 (Vic) for Frankston and Mornington Peninsula.

Reporting Criterion 2: describe the reporting entity's structure, operations, and supply chains

Structure

- Peninsula Health (PH) is registered as a State Government statutory authority.
- Located in Australia
- Address: 2 Hastings Rd, Frankston VIC 3199
- ABN: 52 892 860 159
- Number of employees: 6300+ staff & 700+ volunteers
- PH consists of four major hospitals: Frankston Hospital, Rosebud Hospital, Golf Links Road Rehabilitation Centre, and the Mornington Centre; five community mental health facilities; and five community health centres in Frankston, Mornington, Rosebud, Hastings and Carrum Downs and MePACS.
- Link to Annual Report: <https://www.peninsulahealth.org.au/wp-content/uploads/150-Annual-Report-2021-A4-FINAL-LR-WEB-SPREADS.pdf>

Operations

- Services provided by PH for the community include care across the life continuum for obstetrics, paediatrics, emergency medicine, intensive care, critical care, surgical and general medicine, rehabilitation, and oncology, through to aged care and palliative care. PH also provides extensive services in community health, health education and promotion, ambulatory care, and mental health. PH is a major teaching and research health facility, training the next generation of doctors, nurses, allied health professionals and support staff.
- PH is located in Metropolitan Melbourne covering the local government areas of Frankston, Mornington Peninsula and parts of the City of Kingston. The catchment extends from the bayside areas bordered by Carrum in the north, Langwarrin and Hastings to the east, and down to Portsea and Flinders in the south.
- PH has strong partnerships with Monash University, Deakin University, La Trobe University, Chisholm Institute and Holmesglen Institute.

Supply chain

- Health Share Victoria (HSV) is a state-wide procurement organisation that partners with Victorian public health services to procure best-value goods and services. HSV works in partnership with public health services to understand their requirements, facilitate large-scale collective tenders and manage common-use contracts on behalf of the state.
- Peninsula Health purchases the goods and services it needs from the suppliers who are party to HSV collective agreements. As such, it is recognised that HSV has a significant role in health service supply chains.
- HSV works with approximately 449 tier-one suppliers and is responsible for more than 65 contracts with a spend value of over \$1.16 billion.
- HSV contracts cover a broad range of services, equipment and supplies across a number of categories including ventilators, beds, mattresses, patient trolleys, treatment chairs, hypodermic needles and syringes, gloves, pharmaceutical products, IV fluids, agency labour, catering supplies, laundry and linen services and non-emergency patient transport. A full list of HSV's sourcing categories can be found at <https://www.hsv.org.au/contracts-and-documents/contracts>.

Reporting Criterion 3: describe risks of modern slavery practices in operations & supply chains

- As a public health service Peninsula Health has not caused or contributed to modern slavery practice. However, Peninsula Health recognises that the extensive nature of our global supply chains may expose us to modern slavery risks that exists offshore and in high-risk geographies.
- Peninsula Health has not been able to assess general modern slavery risks as yet.
- Peninsula Health has been significantly impacted by the COVID-19 pandemic, which has resulted in reduced capacity to conduct a detailed risk assessment of our operations and supply chains. Peninsula Health recognises the importance of this activity and will endeavour to conduct a risk assessment in the FY2022-23 reporting period.
- HSV has scoped the general modern slavery risks in health service supply chains by drawing on academic research and international and domestic reports and analysis. Peninsula Health may be exposed to a number of modern slavery risks due to the diversity of products and services sourced by HSV and the associated geographic locations, industries and regulatory systems further down those supply chains.
- Peninsula Health intends to utilise the Modern Slavery Risk Template provided by HSV to ascertain the risk ratings of our suppliers.
- The risk assessment will be conducted in phases as follows:
- In the first phase, during FY2022-23, Peninsula Health is assessing the top 20 suppliers who accounts for 60% of Peninsula's purchasing expenditure.
- Once this risk assessment is completed, Peninsula will provide risk ratings of these suppliers in the Modern Slavery Statement for FY2022-23.

Reporting Criterion 4: describe the actions taken to assess and address risks of modern slavery

Policy

- Peninsula Health is preparing its modern slavery policy to be tabled for approval by the Strategic Procurement Committee and Executive Committee in February 2023.
- The planning, due diligence and contract steps described below are being carried out.

Due Diligence

- A modern slavery questionnaire has been incorporated in to the market release tender documents.
- This questionnaire will be used for all relevant tender categories and suppliers.

Contracts

- A modern slavery clause (provided below) has been incorporated in to Peninsula Health Commercial agreement template.
 - The Contractor must take reasonable steps to identify, assess and address risks of Modern Slavery practices in the operations and supply chains used in the provision of the Services.
 - If at any time the Contractor becomes aware of Modern Slavery practices in the operations and supply chains used in the performance of the Agreement, the Contractor must as soon as reasonably practicable take action to remove these practices from the operations and supply chains.
 - If requested by the Health Service, with at least twenty 20 Business Days' notice, the Contractor must respond to any reasonable requests for information (including any supplier survey) provided by the Health Service relating to its compliance under clause x.xx.
 - Where:
 - either the Contractor or the Health Service has identified:
 - significant or persistent Modern Slavery risks, or
 - alleged Modern Slavery practice(s),
 in the operations and supply chains used in the performance of the Agreement; and
 - the Health Service has made reasonable efforts to engage the Contractor to take action to mitigate the risks or to remove the practice(s); and
 - the Contractor fails to take action to mitigate those risks or remove those practice(s)

the Health Service reserves the right to terminate this Agreement in accordance with clause 21.3.6 which:

21.3.6 directors, officers, staff or sub-contractors of the Contractor commit any offence or do any act or fail to do any act which in the reasonable opinion of the Health Service is of such a nature as to be likely to harm the Health Service's reputation or affect the capacity of the Contractor to discharge its obligations under this Agreement

Training

- All sourcing staff will be provided training using the HSV modern slavery training material during FY2022-23

Reporting Criterion 5: describe how the reporting entity assesses effectiveness of actions

- Peninsula Health has not been able to implement mechanisms to assess the effectiveness of its actions and has been significantly impacted by the COVID-19 pandemic, which has resulted in reduced capacity to implement mechanisms to assess the effectiveness of actions taken to address our modern slavery risks. Peninsula Health recognises the importance of this activity and will endeavour to introduce assessment mechanisms in the FY2022-23 reporting period.

Reporting Criterion 6: describe the process of consultation with related entities

- Peninsula Health does not own or control any other entities.

Reporting Criterion 7: provide any other relevant information

- The combination of COVID-19 pandemic, the code brown declaration in early 2022 and staff turnover and shortages in the Procurement department has had significant impact on the effective operation of sourcing and purchasing at Peninsula Health. The focus during this time has been to achieve maximum operational efficiency with the severely limited resources. As such additional compliance requirements such as the modern slavery risk assessment has not progressed as previously planned.
- During FY2022-23, Peninsula Health intends to assess the top 20 suppliers who contribute to 60% of the purchasing expenditure. The result of this assessment will be provided in the next modern slavery statement.
- Peninsula Health is also introducing modern slavery policy with the first draft nearing completion. This will be tabled for approval by relevant internal committees by Feb 2023.
- Peninsula Health has already taken the right steps to address modern slavery risk by incorporating a comprehensive questionnaire in its tender documents and an effective clause in the commercial agreement template. Further, Peninsula intends to train its sourcing staff on modern slavery risks.
- **Closing statement**
Peninsula Health is confident that the steps taken this year have built a strong foundation for a robust modern slavery framework. We recognise there is more to do and Peninsula Health is committed to continually improving our approach, partnering with our stakeholders and working to eradicate modern slavery.

Approval

This statement was approved by the Board of Peninsula Health in their capacity as principal governing body of Peninsula Health on 7 March 2023.

This statement is signed by Felicity Topp in her role as the Chief Executive Officer of Peninsula Health on 12 May 2023.



Sign: Felicity Topp. Chief Executive 12 May 2023